

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

Dynamic 3D Geosolutions LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:14-cv-00112—LY
	)	
Schlumberger Limited (Schlumberger N.V.);	)	
Schlumberger Holdings Corporation; and	)	
Schlumberger Technology Corporation	)	
	)	
Defendants.	)	

**NOTICE OF SUPPLEMENTAL AUTHORITY**  
**IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS COMPLAINT**

Defendants respectfully submit the attached supplemental authority in support of their Motion to Dismiss the Complaint. (Dkt. 19.) On June 19, 2014, in *Alice Corp. v. CLS Bank International*, the Supreme Court ruled that certain patent claims are invalid as a matter of law under 35 U.S.C. § 101 because they are drawn to a patent-ineligible abstract idea despite being implemented on a computer. No. 13-298, 2014 WL 2765283 (June 19, 2014) (copy attached as Exhibit A).

Applying the two-step framework of *Mayo Collaborative Services v. Prometheus Laboratories, Inc.*, 132 S. Ct. 1289 (2012), the Court first held that all of the claims “are drawn to the abstract idea of intermediated settlement,” which is “‘a fundamental economic practice long prevalent in our system of commerce.’” 2014 WL 2765283, at \*6, \*7 (quoting *Bilski v. Kappos*, 561 U.S. 593, 611 (2010)). Second, the Court held that the claims “merely require generic computer implementation” and lack any “additional features” or “inventive concept,” “sufficient to ‘transform’ the claimed abstract idea into a patent-eligible application” because the

claims “amount to ‘nothing significantly more’ than an instruction to apply the abstract idea ... using some unspecified, generic computer.” *Id.* at \*9 (quoting *Mayo*, 132 S. Ct. at 1298). Finally, the Court held that its ruling as to the method claims applies equally to the system claims, which “add nothing of substance to the underlying abstract idea.” *Id.* at \*12.

Respectfully submitted,

SCOTT, DOUGLASS & McCONNICO, L.L.P.

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**CERTIFICATE OF SERVICE**

I hereby certify that, on June 25, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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